

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

June 26, 2020

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), with the consent of the Department of Justice (DOJ), write to respectfully request the Court's approval of an additional one-week extension of the deadline for the Plaintiffs' Reply in Support of their Second Motion to Compel Directed to the FBI and Opposition to the FBI's Cross-Motion for a Protective Order, from the current July 2, 2020 deadline to July 9, 2020.

The requested extension, which will modify the Court's endorsement at ECF No. 6276, is necessary to facilitate and coordinate the approval of all involved plaintiffs' counsel, particularly surrounding a holiday weekend with related travel, and to work around existing briefing schedules on associated motions.

The PECs consent to the DOJ's and FBI's proposal that this extension would not affect the aspect of the Court's previous endorsement, at ECF No. 6276, that the parties meet and confer within one week after submission of Plaintiffs' brief, to discuss an appropriate deadline for the FBI's reply.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter
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By: /s/ Robert T. Haeefe
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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF